



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

EAG/JDG/CMP  
F.#2008R00530

*271 Cadman Plaza East  
Brooklyn, New York 11201*

September 16, 2011

By Federal Express

Adam D. Perlmutter, Esq.  
260 Madison Avenue, Suite 1800  
New York, NY 10016

Samuel M. Braverman, Esq.  
901 Sheridan Avenue  
Bronx, NY 10451

Re: United States v. Thomas Gioeli, et al.  
Criminal Docket No. 08-240 (S-6) (BMC)

Dear Counsel:

Enclosed are digital video discs and compact discs containing copies of additional disclosures by the government pursuant to 18 U.S.C. § 3500 and Rule 26.2 of the Federal Rules of Criminal Procedure in connection with trial in the above-referenced case ("Section 3500 material"). The government will continue to provide you with additional disclosures of Section 3500 material on a rolling basis.

These materials are provided to you pursuant our agreement to provide the defendants with early disclosure of Section 3500 material as well as the protective order regarding this material issued by the Court on August 12, 2011 (see Docket No. 1227).

Adam D. Perlmutter, Esq.  
Samuel M. Braverman, Esq.  
September 16, 2011  
Page 2

If you have any questions regarding the enclosed material, please contact us.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/ Elizabeth Geddes  
Elizabeth A. Geddes  
James D. Gatta  
Cristina M. Posa  
Assistant U.S. Attorneys

Enclosures

cc: All Counsel (by ECF)  
Clerk of the Court (BMC) (by ECF)